

Philip D. Anker (*Pro Hac Vice* admitted)
Allyson Pierce (Cal. Bar No. 325060)
**WILMER CUTLER PICKERING HALE
AND DORR LLP**
250 Greenwich Street
New York, NY 10007
Telephone: 212.230.8800
Facsimile: 212.230.8888
philip.anker@wilmerhale.com
allyson.pierce@wilmerhale.com

Christopher T. Casamassima (Cal. Bar No.
211280)
**WILMER CUTLER PICKERING HALE
AND DORR LLP**
350 South Grand Avenue, Suite 2100
Los Angeles, CA 90071
Telephone: 213.443.5300
Facsimile: 213.443.5400
chris.casamassima@wilmerhale.com

*Counsel to Canyon, Citadel, Davidson Kempner, Farallon, Sculptor, and Värde, on behalf of
themselves, and certain funds and counts managed, advised, or sub-advised by them*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Reorganized Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**NOTICE OF APPEAL AND
STATEMENT OF ELECTION TO HAVE
APPEAL HEARD BY DISTRICT COURT**

NOTICE IS HEREBY GIVEN that Canyon Capital Advisors LLC (“Canyon”), Citadel
Advisors LLC (“Citadel”), Davidson Kempner Capital Management LP (“Davidson Kempner”),
Farallon Capital Management, L.L.C. (“Farallon”), Sculptor Master Fund, Ltd., Sculptor
Enhanced Master Fund, Ltd., Sculptor Credit Opportunities Master Fund, Ltd., Sculptor GC

Opportunities Master Fund, Ltd., Sculptor SC II, LP (collectively, “Sculptor”), and Värde Partners, Inc. (“Värde”), on behalf of themselves, and/or certain funds and accounts managed, advised, or sub-advised by them (collectively, the “RSA Noteholders” or “Appellants”), by and through their undersigned counsel, hereby appeal to the United States District Court for the Northern District of California, pursuant to 28 U.S.C. § 158(a) and Rule 8003 of the Federal Rules of Bankruptcy Procedure, from the *Order Disallowing Administrative Expense Claims of Canyon Capital Advisors LLC et al.* [Bankr. Dkt. No. 9335] (the “Order”) and the related *Memorandum Decision Disallowing Administrative Expense Claims* [Bankr. Dkt. No. 9333] (the “Memorandum”) entered in the above-captioned case on October 22, 2020. A copy of the Order is attached hereto as **Exhibit A**. A copy of the Memorandum is attached hereto as **Exhibit B**. The RSA Noteholders anticipate that notices of appeal of related orders [Bankr. Dkt. Nos. 9334, 9336] and the Memorandum will be filed by Elliott Management Company (“Elliott”), and by Pacific Investment Management Company LLC, as investment adviser or manager for certain funds and accounts (“PIMCO”).

Pursuant to 28 U.S.C. § 158(a), the Order and Opinion are appealable as a matter of right. Pursuant to 28 U.S.C. § 158(c)(1), the Appellants hereby elect to have this appeal heard by the United States District Court for the Northern District of California.

The parties to the Order (or related orders) and Memorandum, other than the RSA Noteholders, and the names, addresses and telephone numbers of their respective attorneys are set forth below.

Party	Counsel
Reorganized Debtors	WEIL, GOTSHAL & MANGES LLP Stephen Karotkin (<i>Pro Hac Vice</i> admitted) Ray C. Schrock, P.C. (<i>Pro Hac Vice</i> admitted) Jessica Liou (<i>Pro Hac Vice</i> admitted) Theodore E. Tsekerides (<i>Pro Hac Vice</i> admitted) 767 Fifth Avenue

	<p>New York, New York 10153-0119 Telephone: 212.310.8000 Facsimile: 212.310.8007 stephen.karotkin@weil.com, ray.schrock@weil.com, jessica.liou@weil.com, theodore.tsekerides@weil.com</p> <p>KELLER BENVENUTTI KIM LLP Tobias S. Keller (Cal. Bar No.151445) Peter J. Benvenutti (Cal. Bar No. 60566) Jane Kim (Cal. Bar No. 298192) 650 California Street, Suite 1900 San Francisco, California 94108 Telephone: 415.496.6723 Facsimile: 650.636.9251 tkeller@kbbkllp.com pbenvenutti@kbbkllp.com jkim@kbbkllp.com</p>
Elliott	<p>ROPES & GRAY LLP Rocky C. Tsai (Cal. Bar No. 221452) 3 Embarcadero Center San Francisco, CA 94111 Telephone: 415.315.6369 Facsimile: 415.315.6350 rocky.tsai@ropesgray.com</p> <p>ROPES & GRAY LLP Andrew G. Devore (<i>Pro Hac Vice</i> admitted) Prudential Tower 800 Boylston Street Boston, MA 02199 Telephone: 617.951.7000 Facsimile: 617.951.7050 andrew.devore@ropesgray.com</p> <p>ROPES & GRAY LLP Gregg M. Galardi (<i>Pro Hac Vice</i> admitted) Keith H. Wofford (<i>Pro Hac Vice</i> admitted) Daniel G. Egan (<i>Pro Hac Vice</i> admitted) 1211 Avenue of the Americas New York, NY 10036 Telephone: 212.596.9000 Facsimile: 212.596.9090 gregg.galardi@ropesgray.com</p>

	keith.wofford@ropesgray.com daniel.egan@ropesgray.com
PIMCO	David P. Simonds (Cal. Bar No. 214499) Edward J. McNeilly (Cal. Bar No. 314588) HOGAN LOVELLS US LLP 1999 Avenue of the Stars, Suite 1400 Los Angeles, California 90067 Telephone: 310.785.4600 Facsimile: 310.785.4601 david.simonds@hoganlovells.com edward.mcneilly@hoganlovells.com Michael C. Hefter (<i>Pro Hac Vice</i> admitted) Matthew Ducharme (<i>Pro Hac Vice</i> admitted) HOGAN LOVELLS US LLP 390 Madison Avenue New York, New York 10017 Telephone: 212.918.3000 Facsimile: 212.918.3100 michael.hefter@hoganlovells.com matthew.ducharme@hoganlovells.com

[Continued on following page]

1 Dated: November 4, 2020

/s/ Philip D. Anker

Philip D. Anker (*Pro Hac Vice* admitted)
Allyson Pierce (Cal. Bar No. 325060)
**WILMER CUTLER PICKERING HALE
AND DORR LLP**
250 Greenwich Street
New York, NY 10007
Telephone: 212.230.8800
Facsimile: 212.230.8888
philip.anker@wilmerhale.com
allyson.pierce@wilmerhale.com

Christopher T. Casamassima (Cal. Bar No.
211280)
**WILMER CUTLER PICKERING HALE
AND DORR LLP**
350 South Grand Avenue, Suite 2100
Los Angeles, CA 90071
Telephone: 213.443.5300
Facsimile: 213.443.5400
chris.casamassima@wilmerhale.com

*Counsel to Canyon, Citadel, Davidson
Kempner, Farallon, Sculptor, and Värde, on
behalf of themselves, and certain funds and
counts managed, advised, or sub-advised by
them*